Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 RECEIVED

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF RESPONSES OF WITNESS BARON TO ADVO INTERROGATORIES (ADVO/USPS-T12-6-10)

The United States Postal Service hereby moves for late acceptance of the response of witness Baron to the following interrogatories of Advo, Inc.: ADVO/USPS-T12-6-10, filed on March 20, 2000. The large number of interrogatories recently directed to Postal Service witnesses requiring the involvement of this witness, as well as the need to assist in the preparation of related library references, prevented earlier filing.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. (202) 268-2993; Fax: -5402 Washington, D.C. 20260-1137 April 4, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 April 4, 2000